

EXHIBIT A-1



Dilip Jana <janadilip@gmail.com>

Case 4:24-cv-00698-SDJ-BD: Demand for Native Format Production with Metadata and Hashes

1 message

Dilip Jana <janadilip@gmail.com>

Tue, Jul 8, 2025 at 4:51 PM

To: peter.wahby@gtlaw.com, morgan.jones@gtlaw.com, Holmes.Hampton@gtlaw.com

Cc: Dilip Jana <janadilip@gmail.com>

Dear Mr. Wahby, Ms. Jones, and Mr. Hampton,

In the event Walmart intends to produce any documents in this matter, please specify **precisely which documents are being produced and identify the corresponding discovery request(s) to which each document is responsive.**

Given **Walmart's documented history of altered documents in this litigation (see Dkt. 72)**, Plaintiff demands that **all documents be produced in native format with full metadata at the time of production to preserve authenticity and chain of custody.**

Specifically:

Emails:

Please produce emails in **native .eml format** with full metadata intact, including headers, bodies, attachments, and embedded MIME structures. Please also provide **SHA-256 (or MD5) hash values for each .eml file at the time of production.**

Workday Files:

For Walmart internal Workday files, please produce in **native format with full system metadata**, including:

- "Created By," "Created On," "Modified By," "Modified On," revision histories, and user identifiers;
- Native file formats, or .xml/.json structured exports where available;
- Screenshots with visible metadata for notes or attachments if necessary;
- **Hash values for each native file.**

Certification:

Please confirm under **Rule 26(g)**, with **certification by lead counsel Peter Wahby**, that the files produced are complete, true, and unaltered exports directly from Walmart's systems, preserving metadata and chain of custody.

This request is made to ensure the integrity of these proceedings while maintaining clear tracking of production and discovery compliance.

Please confirm by **5:00 PM on Monday, July 14, 2025**, whether Walmart will comply with this request and provide a clear timeline for production, if any. If Walmart intends to produce in any other format or objects, please identify the legal and technical basis.

I remain available to confer should you require clarification to avoid the need for further court intervention under **Rule 37**.

Thank you for your attention to these issues.

Respectfully,

Dr. Dilip Jana
Pro Se Plaintiff

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